

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HILARY REMIJAS, MELISSA FRANK,  
DEBBIE FARNOUSH, and JOANNE KAO,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

THE NEIMAN MARCUS GROUP, LLC, a  
Delaware limited liability company,

Defendant.

Case No. 1:14-cv-01735

Honorable Samuel Der-Yeghiayan

**AGREED MOTION SEEKING PERMISSION TO EXCEED PAGE LIMITATION IN  
MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT AND CERTIFICATION OF  
SETTLEMENT CLASS**

Plaintiffs Hilary Remijas, Melissa Frank, Debbie Farnoush, and Joanne Kao ("Plaintiffs"), by and through their attorneys, respectfully move for an extension of the fifteen-page limit applicable to their Memorandum in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class ("Memorandum"). In support of this motion, Plaintiffs state as follows:

1. Plaintiffs respectfully submit that in order to properly explain to the Court the details of the proposed class-wide Settlement, and present the merits of certifying a class for settlement purposes, thirty (30) pages are required. Plaintiffs believe that in a Memorandum of this complexity and consequence to the proposed class, exceeding the fifteen-page limitation will

benefit the Court's consideration of the substantial rights and remedies that Plaintiffs' Motion seeks on behalf of the proposed class. Plaintiffs submit that in these circumstances, it is fair and consistent with the interests of justice to allow for a brief of this length in support of a Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class. There is no prejudice to Defendant Neiman Marcus, and Daniel Craig, counsel for Defendant, represented to Robert Ahdoot, counsel for Plaintiffs, that Defendant does not oppose this motion.

2. In light of the foregoing, Plaintiffs respectfully request that they be granted leave to file a thirty-page Memorandum in support of their Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class.

WHEREFOR, Plaintiffs respectfully request that this Court enter an order permitting them to file a thirty-page Memorandum in support of their Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class.

Dated: March 17, 2016

Respectfully submitted,

/s/ Tina Wolfson

Tina Wolfson

[twolfson@ahdootwolfson.com](mailto:twolfson@ahdootwolfson.com)

**AHDOOT & WOLFSON, PC**

1016 Palm Ave.

West Hollywood, CA 90069

Tel: 310-474-9111; Fax: 310-474-8585

*Proposed Class Counsel and Attorneys for  
the Plaintiffs*

/s/ John A. Yanchunis

John A. Yanchunis

[jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)

**MORGAN & MORGAN**

**COMPLEX LITIGATION DEPARTMENT**

201 North Franklin Street, 7th Floor

Tampa, FL 33602

Tel: 813-275-5272; Fax: 813-226-5402

*Proposed Class Counsel and Attorneys for  
the Plaintiffs*

/s/ Joseph J. Siprut

Joseph J. Siprut

*jsiprut@siprut.com*

**SIPRUT PC**

17 North State Street, Suite 1600

Chicago, Illinois 60602

Tel: 312-236-0000; Fax: 312-878-1342

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that the foregoing Agreed Motion Seeking Permission to Exceed Page Limitation in Memorandum In Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class was filed electronically with the Clerk of the Court using the CM/ECF system on this 17th day of March, 2017, and served electronically on all counsel of record.

/s/ Tina Wolfson  
TINA WOLFSON  
AHDOOT & WOLFSON, PC  
1016 Palm Ave.  
West Hollywood, CA 90069  
E-mail: twolfson@ahdootwolfson.com